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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CB SURETY, LLC, et al.,

Defendants.

Civil Case No. 2:23-cv-02812-TLN-DB

AFFIDAVIT OF ANDREW K.
CRAWFORD IN SUPPORT OF THE
UNITED STATES' MOTION A DEFAULT
JUDGMENT AGAINST DEFENDANTS
TRAVIS SMITH, STEPHEN
CHRISTOPHER, BRYAN BASS, CB
SURETY LLC, PEAK BAKERY LLC, KP
TESTING, LLC, MOTION MEDIA
MARKETING INC., SJC FINANCIAL
SERVICES INC., BASS BUSINESS
CONSULTANTS, AND THINK
PROCESSING LLC

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2 I, Andrew K. Crawford, hereby declare:

3 1. I am a Trial Attorney with the U.S. Department of Justice's Civil Division,
4 Consumer Protection Branch, and I am a counsel in this matter for Plaintiff the United States of
5 America. Unless indicated otherwise, I have personal knowledge of the facts stated herein, and if
6 called as a witness, would competently testify thereto.

7 2. This affidavit is offered in support of Plaintiff's Request for Entry of Default
8 Judgment against Defendants Travis Smith, Stephen Christopher, Bryan Bass, CB Surety LLC,
9 Peak Bakery LLC, KP Testing, LLC, Motion Media Marketing Inc., SJC Financial Services Inc.,
10 Bass Business Consultants, and Think Processing LLC.

11 3. On December 1, 2023, the United States filed its Complaint (ECF No. 1).
12 Pursuant to Rule 4 of the Federal Rules of Civil Procedure, the United States served the
13 Summons (ECF No. 12), Complaint, and the Initial Pretrial Scheduling Order (ECF No. 13) on
14 Defendants Travis Smith, Stephen Christopher, CB Surety LLC, Peak Bakery LLC, KP Testing,
15 LLC, Motion Media Marketing Inc., SJC Financial Services Inc., and Think Processing LLC.

16 4. Pursuant to Rule 12(a)(1)(A)(i) of the Federal Rules of Civil Procedure, the
17 aforementioned Defendants had 21 days to answer or otherwise respond to the Complaint.

18 5. On January 26, 2024, pursuant to Rule 4(d) of the Federal Rules of Civil
19 Procedure, the United States sent a request to waive service to Defendant Bryan Bass,
20 individually, and in his capacity as a director of Defendant Bass Business Consultants. On
21 January 31, 2024, Defendant Bryan Bass signed the waiver of service of behalf of himself (ECF
22 No. 73) and on behalf of Defendant Bass Business Consultants (ECF No. 74).

23 6. Pursuant to Rule 12(a)(1)(A)(ii) of the Federal Rules of Civil Procedure,
24 Defendants Bryan Bass and Bass Business Consultants had 90 days to answer or otherwise
25 respond to the Complaint. Therefore, an answer or response to the Complaint was due on or
26 before April 25, 2024.
27

7. The below table sets forth the date on which each of these Defendants was served, the docket number of the corresponding filing proving service, and the date on which each Defendant's response to the Complaint was due.

Defendant	Service Date	Docket No.	Response Due
Travis Smith	1/4/24	ECF No. 54	1/25/24
Stephen Christopher	1/5/24	ECF No. 50	1/26/24
CB Surety LLC	12/27/23	ECF No. 48	1/17/24
Peak Bakery LLC	12/27/23	ECF No. 49	1/17/24
KP Testing LLC	1/10/24	ECF No. 53	1/31/24
Motion Media Marketing Inc.	1/5/24	ECF No. 51	1/26/24
SJC Financial Services Inc.	1/5/24	ECF No. 52	1/26/24
Think Processing	1/10/24	ECF No. 55	1/31/24
Bryan Bass	1/26/24	ECF No. 73	4/25/24
Bass Business Consultants	1/26/24	ECF No. 74	4/25/24

8. On February 8, 2024, pursuant to Rule 55(b)(1) of the Federal Rules of Civil Procedure, the United States filed a request for an entry of a default by the Clerk as to Defendants Travis Smith, Stephen Christopher, CB Surety LLC, Peak Bakery LLC, KP Testing, LLC, Motion Media Marketing Inc., SJC Financial Services Inc., and Think Processing LLC (ECF No. 64).

9. On February 15, 2024, the Clerk of Court filed its certificate of entry of default as to Defendants Travis Smith, Stephen Christopher, CB Surety LLC, Peak Bakery LLC, KP Testing, LLC, Motion Media Marketing Inc., SJC Financial Services Inc., and Think Processing LLC (ECF No. 65).

10. On May 10, 2024, pursuant to Rule 55(b)(1) of the Federal Rules of Civil Procedure, the United States filed a request for an entry of a default by the Clerk as to Defendants Bryan Bass and Bass Business Consultants (ECF No. 75).

11. On May 22, 2024, the Clerk of Court filed its certificate of entry of default as to Defendants Bryan Bass and Bass Business Consultants (ECF No. 77).

1 12. As of the date of this Affidavit, the United States has not received an answer or
2 other response from any of the above-listed Defendants, nor is there record of an answer or
3 response entered on the Court's electronic docket.

4 13. Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the
5 foregoing is true and correct to the best of my knowledge and belief.

6 Executed on July 25, 2024, in Washington, DC.

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9 ANDREW K. CRAWFORD
10 Trial Attorney
11 Consumer Protection Branch
12 United States Department of Justice
13 Attorney for Plaintiff United States
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